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New Amendment to

10 CFR PART 830

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New Amendment to 10 CFR PART 830

- Status of Amendment
- Scope of Changes
 - General
 - Quality Assurance (QA)
- Safe harbors in Safety Basis Subpart
- Impact on Enforcement
- Impact on Integrated Safety Management

Status of Amendment

- O Interim Final Rule published in the Federal Register October 10, 2000.
- O Comment period ended November 9, 2000.
- O Final rule effective <u>December 11, 2000</u>.

Scope of Changes: General

- O Part 830 expanded to apply to the following:
 - Offsite activities (i.e., manufacturing)
 - Government-owned Government-operated nuclear facilities (GoGos)
 - Federal employees

Scope of Changes: General (continued)

- **O Exemption Changes**
 - weapons activities (no longer exempted)
 - transportation activities (exemption narrowed, only DOT-regulated activities are exempted)
 - NWPA activities (exempted)
 - NASA launches (exempted)

Scope of Changes General (continued)

- O Graded approach to be applied where "appropriate"
 - Apply graded approach to QA and documented safety analysis
 - Do not apply graded approach to TSR or USQ
- O Plain language ("must" = "shall")

Scope of Changes QA (Subpart A)

- Integrates ISM & QAP
- Clarifies Part 830 applies to work processes developed to meet contract requirements
- Applies to--
 - all nuclear facilities & activities (Cat 1, 2, & 3 and radiological) unless specifically excluded
 - contractors, subcontractors & suppliers,
 including those that supply items & services

Scope of Changes Safety Basis (Subpart B)

- Adds requirements for a documented safety analysis (e.g., SAR), TSRs, and a USQ process
- Applies only to Category 1, 2, & 3 nuclear facilities and activities
- O Provides "safe harbor" methods tailored to the hazards and the work

Scope of Changes Safety Basis Schedules

- Existing Facilities
 - USQ procedure to be submitted by 4/10/2001
 - Documented safety analysis & TSRs to be submitted by 4/10/2003
- New Facilities
 - Preliminary documented safety analysis before starting construction or procurement
 - USQ procedure, documented safety analysis,
 & TSR before operation

Scope of Changes Current Safety Basis

Contractors are required to meet the existing, DOE-approved safety basis in effect on October 10, 2000, pending approval of the SER approving the new safety basis.

Contractors who cannot meet the current safety basis because it does not reflect current operations should contact DOE.

"Safe Harbor" Category 3 Facilities

- O Contractors may use a simplified method to develop a safety basis for hazard category 3 nuclear facilities
 - basic description of the facility/activity and its operations
 - qualitative hazards analysis
 - hazard controls (consisting primarily of inventory limits and safety management programs) and their bases.

"Safe Harbors" Additional

Environmental restoration activities

Deactivation or transition surveillance and maintenance activities

Decommissioning activities

Facilities with a limited operational life

Nuclear explosive facilities

Impact on Enforcement

- Clarifies QA rule applies to work processes adopted to meet either rule or contract
- Clarifies QA rule applies to all nuclear facilities or activities
- Expands QA rule to apply to nuclear activities on or off site
- Adds safety basis requirements for hazard category 1,
 2, or 3
- O Does <u>not</u> allow DOE to apply PAAA enforcement to Federal employees

Impact on Integrated Safety Management/ DOE orders

- Integrates QAP with ISM
- O Confirms ISM requirements for safety bases
- Allows contractors to use safety bases developed to meet ISM when they meet rule requirements
- O Consistent with and derived from current DOE orders 5480.21, .22, .23 and corresponding guidance/standards